

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 25, 2019
2. Name of company covered by this certification: True Wireless, Inc.
3. Form 499 Filer ID: 827350
4. Name of signatory: David Ansani
5. Title of signatory: President
6. Certification:

I, David Ansani, certify that I am an Officer of True Wireless, Inc. ("Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's rules, 47 C.F.R. §§ 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review).

The Company has not received any customer complaints in the past calendar year concerning the unauthorized release of CPNI. The Company has not taken any actions against data brokers, including proceedings instituted or petitions filed by the company at either state commissions, the court system or at the Commission.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.


David Ansani

President

True Wireless, Inc.

Executed February 25, 2019

True Wireless, Inc.

Customer Proprietary Network Information Compliance Procedures

True Wireless, Inc. has implemented the following procedures in compliance with the requirements set forth in 47 C.F.R. Part 64, Subpart U, Section 2001 *et seq.* of the FCC rules governing the use of Customer Proprietary Network Information.

Information protected by True Wireless includes all information defined as CPNI at Section 222(h)(1) of the Communications Act of 1934, as amended, 47 U.S.C. 222(h)(1) including information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by a customer and made available to True Wireless by the customer solely by virtue of the carrier-customer relationship. Also protected is information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

True Wireless may use, disclose, or permit access to CPNI without customer approval in its provision of the communications service from which such information is derived; for services necessary to, or used in, the provision of such communications service; to initiate, render, bill and collect for communications services; to protect the rights or property of True Wireless, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to market services within the category or categories of services to which the customer already subscribes, including to market customer premises equipment (CPE), information services, call answering, voice mail or messaging, voice storage and retrieval services; and to provide maintenance or repair services; or as required by law.

True Wireless does not use, disclose, or permit access to CPNI to identify or track customers who call competing service providers. When True Wireless receives or obtains proprietary information from another carrier for purposes of providing a telecommunications service, it shall use such information only for such purpose, and shall not use such information for its own marketing efforts. True Wireless does not make available CPNI to third parties, except in cases where required by law. True Wireless does not use or disclose information stored on mobile handsets; nor does it direct customers to store information on mobile handsets.

True Wireless does not provide Call Detail Information (CDI) to inbound callers. CDI includes any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call. True Wireless may instead provide CDI to a Customer at their request by sending to their address of record that has been on file with True Wireless for at least 30 days, or by calling back the Customer at their telephone number of record.

True Wireless authenticates the identity of users seeking access to account information online. The customer's password, which consists of an arrangement of numbers, letters and/or special characters, must be entered each time the customer accesses the account.

True Wireless notifies customers whenever a PIN, password, online account or address of record is created or changed. This notification may be through carrier-initiated voice mail or text message to the telephone number of record, or by mail to the address of record. Notifications do not reveal the changed information or otherwise send the new account information. The notification will direct the customer to contact True Wireless should there be any questions regarding the change.

True Wireless representatives at its corporate stores do not disclose Call Detail Information. For all other CPNI, True Wireless requires the customer to provide, as verification of identity, a valid, non-expired, government-issued photo ID (such as driver's license or passport) matching the customer's account information.

True Wireless personnel are trained as to when they are and are not authorized to release or use CPNI, and are aware that any violation of these rules will subject personnel to express disciplinary action which can include dismissal and possible criminal penalties.

Although True Wireless does not use CPNI for marketing, it has in place a supervisory review process to oversee outbound marketing and assure compliance with these procedures.

True Wireless notifies the appropriate government entities, by electronic means, of any CPNI breach within 7 days of discovery and provides required notices to its customers upon completion of law enforcement notification procedures.

True Wireless maintains records of any breaches discovered and the resulting notifications to government entities and customers for a minimum of 2 years. The record includes, if available, date of discovery and notification, detailed description of CPNI that was the subject of the breach, and the circumstance of the breach.

True Wireless maintains a record of all customer complaints related to their handling of CPNI, and the records of such complaints, for at least two years.

True Wireless will have an officer of the company sign a compliance certificate on an annual basis stating that the officer has personal knowledge that True Wireless has established operating procedures that are adequate to ensure its compliance with FCC's CPNI rules. The certificate for each year will be filed with the FCC by March 1 of the subsequent year, and will be accompanied by a summary or copy of this policy that explains how operating procedures ensure that True Wireless is in compliance with the FCC's CPNI rules. In addition, the filing must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. Confidential portions of these submissions shall be redacted from the public version of the filing and provided only to the FCC.